

Tyler A. Brown (State Bar No. 121350)
 Hardev S. Chhokar (State Bar No. 311802)
 JACKSON LEWIS P.C.
 50 California Street, 9th Floor
 San Francisco, California 94111-4615
 Telephone: (415) 394-9400
 Facsimile: (415) 394-9401
 E-mail: Tyler.Brown@jacksonlewis.com
 E-mail: Hardev.Chhokar@jacksonlewis.com

Attorneys for Defendant
 J & J WORLDWIDE SERVICES, INC.

Na'il Benjamin (State Bar No. 240345)
 BENJAMIN LAW GROUP, P.C.
 1290 B Street, Suite 314
 Hayward, California 94541
 Telephone: (510) 897-9967
 Facsimile: (510) 439-2632
 E-mail: nbenjamin@benjaminlawgroup.com

Attorneys for Plaintiff
 JEANETTE MOORE

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

JEANETTE MOORE,
 Plaintiff,

v.

J & J WORLDWIDE SERVICES, a Texas
 Corporation; and, DOES 1-10, inclusive,
 Defendant.

Case No. 3:19-cv-06356-RS

**STIPULATION AND ORDER TO
 CONTINUE TRIAL DATE AND ALL
 RELATED DEADLINES AS
 MODIFIED BY THE COURT**

Complaint Filed: 07/17/2019
 Action Removed: 10/04/2019
 Trial Date: 09/06/2021

Pursuant to N.D. Cal. Local Rules 6-2 and 7-12, Plaintiff Jeanette Moore ("Plaintiff") and Defendant J & J Worldwide Services ("Defendant") (collectively, the "Parties") hereby stipulate as follows:

1. WHEREAS, the Parties attended mediation on February 11, 2021 with Vivien Williamson, but were unable to resolve this case;
2. WHEREAS, as a result of the factual disputes uncovered during mediation, the

Parties agreed that they would need more time to conduct discovery beyond the current discovery cut-off dates, including depositions of Defendant's former employees and Plaintiff's deposition;

3. WHEREAS, Plaintiff's lead attorney at Benjamin Law Group P.C., Kristin Smith, left the firm, which required her colleague, Na'il Benjamin, to take over for Ms. Smith and to familiarize himself with the case;

4. WHEREAS, the Parties are currently coordinating depositions of relevant witnesses, but have encountered scheduling issues with their limited availability;

5. WHEREAS, Defendant's counsel also needs additional time to continue to meet and confer with Plaintiff's counsel in hopes of resolving its ongoing discovery disputes with Plaintiff's discovery responses and document production;

6. WHEREAS, the need to conduct further discovery will affect the Parties' ability to timely submit pretrial motions by the current pretrial motion deadline of June 7, 2021;

7. WHEREAS, Plaintiff's counsel is currently scheduled for trial in four matters between January 2022 and April 2022;

8. WHEREAS, the Parties respectfully request that the deadline for non-expert discovery be continued and the remaining trial deadlines be adjusted accordingly, as follows:

Event	Current Deadline	Revised Deadline
Non-Expert Discovery cut-off:	04/28/2021	10/08/2021
Further Case Management Conference		10/14/2021
Disclosure of identities and reports of expert witnesses:	05/12/2021	10/22/2021
Rebuttal expert reports:	05/26/2021	11/05/2021
Pretrial motion deadline	06/07/2021	11/18/2021
Close of expert discovery:	06/09/2021	11/22/2021

Pretrial conference	8/25/2021	2/9/2022
Trial date:	9/7/2021	2/22/2022

IT IS SO STIPULATED.

Dated: April 14, 2021

BENJAMIN LAW GROUP P.C.

By: /s/ Na'il Benjamin

Na'il Benjamin
Attorneys for Plaintiff
JEANETTE MOORE

Dated: April 14, 2021

JACKSON LEWIS P.C.

By: /s/ Hardev S. Chhokar

Tyler A. Brown
Hardev S. Chhokar
Attorneys for Defendant
J & J WORLDWIDE SERVICES, INC.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: April 14, 2021


Hon. Richard Seeborg
Chief United States District Judge

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